June 1, 2025

Since my last report, I have continued to work closely with the parties to assist claimants by making the website and the questionnaire as user-friendly as possible. Small fixes and improvements have made, based on suggestions of counsel, and they are efficiently implemented by Epiq.

With the assistance of counsel and myself, Epiq prepared videos that can be accessed by those claimants. The videos orally guide the claimant through the questionnaire. Another video guides such claimants in reviewing and filling out the opt-in and opt-out forms. While the preparation of the videos was initially intended to help those with literacy issues, but in fact the videos are helpful to anyone seeking to navigate the website and finish the questionnaire.

In the coming month, I will working with counsel to assure that those who wish to file a questionnaire actually complete it before the July 1 deadline.

Beyond the issues of implementing the questionnaire, I worked this month on assessing the parties' positions on settlement, by engaging in preliminary, confidential discussions with class counsel and with defense counsel.

Respectfully submitted

Daniel J. Capra

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Special Master